



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

JMH/FJN/MAA/SAC  
F. #2019R00929

*271 Cadman Plaza East  
Brooklyn, New York 11201*

August 12, 2022

By ECF

The Honorable Eric R. Komitee  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Baimadajie Angwang  
Criminal Docket No. 20-442 (EK)

Dear Judge Komitee:

The government writes to supplement the record as to the Court's order granting the government's motion under the Classified Information Procedures Act, Title 18, United States Code, Appendix III, Section 4. See ECF No. 115 (Aug. 11, 2022) ("the CIPA IV Order"); see also Gov't Ltr, ECF No. 116 (Aug. 11, 2022) (government's first update on compliance with the CIPA IV Order). In the CIPA IV Order, the Court directed the government to complete its production of unclassified admissions and classified substitutions by today, August 12, 2022.

Earlier this afternoon, the government produced the unclassified admissions to the defense as required by the CIPA IV Order. The government also prepared for delivery by the Classified Information Security Officer ("the CISO") the classified substitution as required by the CIPA IV Order. From discussions with CISO personnel, the government understands that the earliest CISO personnel can be available to deliver the classified substitution to defense counsel in an appropriate space for counsel's review is this coming Wednesday, August 17, 2022. The government further understands that, in the meantime, the CISO will endeavor to conduct all necessary security briefings with defense counsel so that counsel's review may proceed as expeditiously as possible on August 17, and that the CISO has reached out to defense counsel to coordinate those briefings accordingly. The government further notes its understanding that the CISO's involvement is necessary to permit defense counsel access to an appropriate space where counsel may prepare filings related to the classified substitution under CIPA Section V, if any.

